



**CONSUMERS
FEDERATION
OF AUSTRALIA**

Developing and promoting
the consumer interest

PO Box 16193
Collins Street West VIC 8007

By email: adjudication@acc.gov.au

20 April 2020

Tom Whitby
Australian Competition & Consumer Commission
23 Marcus Clarke Street
Canberra ACT 2601

Dear Tom,

Battery Stewardship Council – application for authorisation

The Consumers' Federation of Australia (CFA) welcomes industry-led initiatives to increase the rate of battery recycling in Australia through the establishment of a national stewardship scheme for batteries.

CFA is the peak body for consumer organisations in Australia. CFA represents a diverse range of consumer organisations, including most major national consumer organisations. Our organisational members and their members represent or provide services to millions of Australian consumers.

CFA's member organisations include membership-based organisations, organisations that provide information, advice, counselling or assistance to consumers, and organisations that identify regulations or market features that harm consumer interests and propose solutions.

CFA did engage with the Battery Stewardship Application in the development of the authorisation application. CFA noted its support for the proposed Battery Stewardship Scheme as we consider it will improve consumer access to safe and responsible options for recycling of batteries. In particular, we support the scheme providing consumers with a broad array of drop-off options for used batteries. The education model proposed by the Scheme will also increase consumer understanding of battery safety and recycling.

However, CFA considers that any industry-led initiative to improve consumer and community outcomes should have representatives of all stakeholder groups, particularly consumer groups. For that reason, we would urge that the governance of the scheme have a reserved place for an expert consumer representative. It is established that consumer representative involvement in industry initiatives or codes of conduct improves community confidence and helps ensure schemes meet

community expectations. CFA has procedures recognised by government and industry for the appointment of consumer representatives.¹

Your sincerely,



Gerard Brody
Chairperson
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¹ See <http://consumersfederation.org.au/representing-consumers/cfa-representatives-policy/>